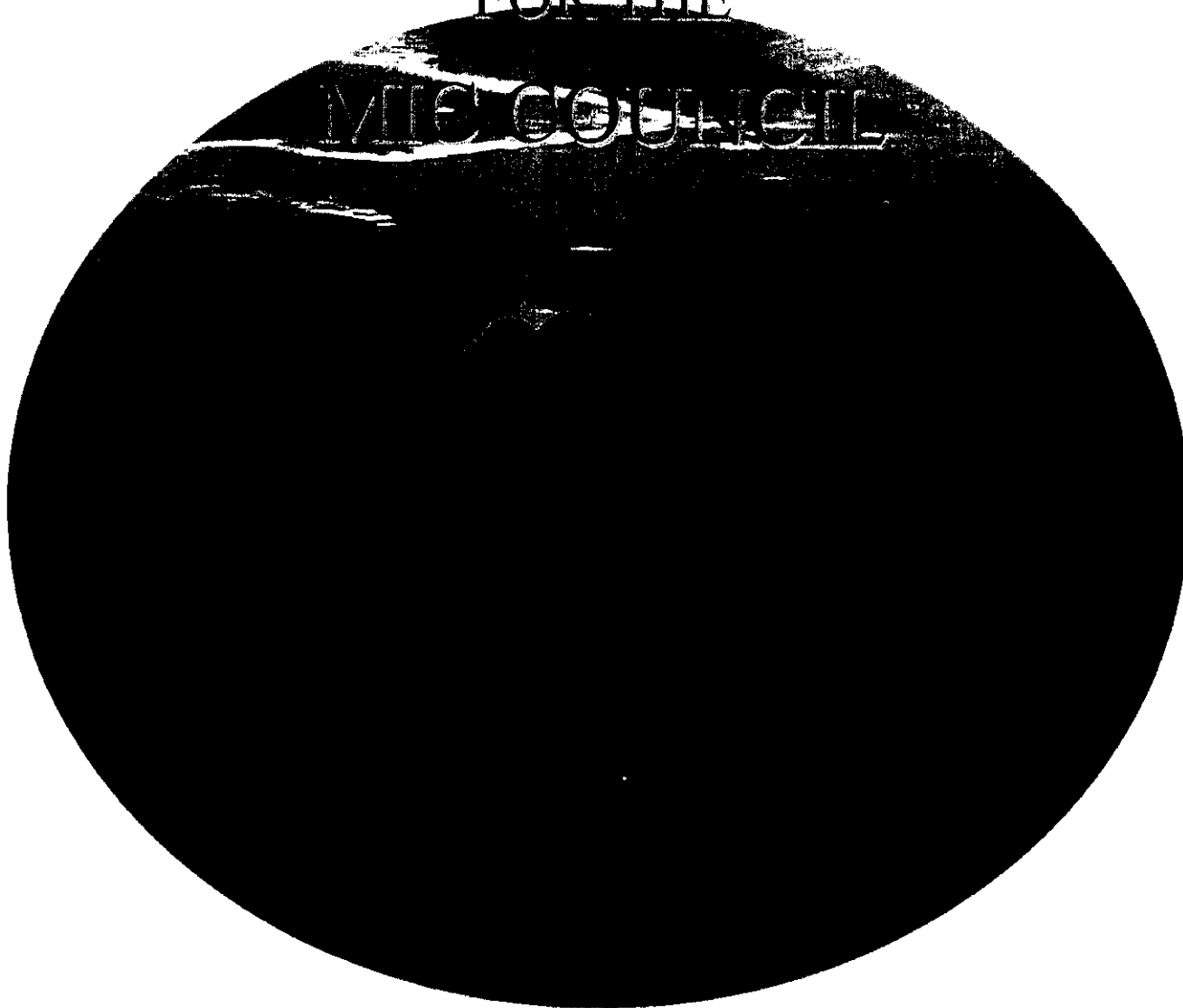


BRIEFING PAPER

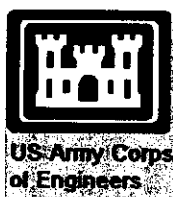
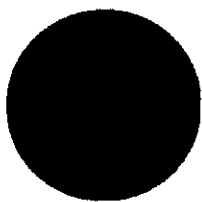
FOR THE

MIC COUNCIL



ANNETTE ISLAND, ALASKA

OCTOBER 2000

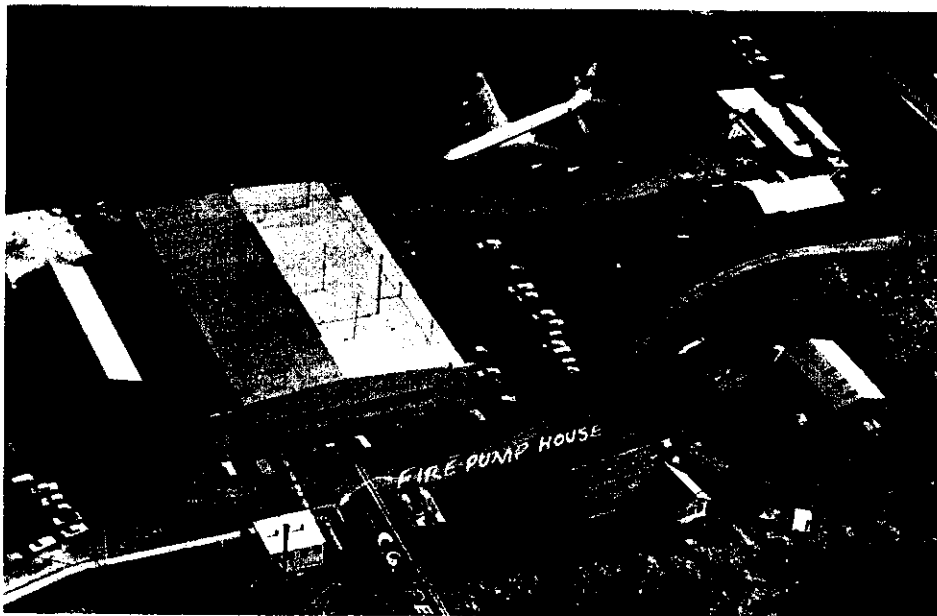


This briefing paper has been prepared for the Council Members of the Metlakatla Indian Community (MIC) to provide the MIC with an overview of the federal environmental remediation activities on Annette Island. Significant investigation and cleanup has been successfully accomplished through the cooperative efforts of the MIC, the Bureau of Indian Affairs (BIA), the Federal Aviation Administration (FAA), the U.S. Army Corps of Engineers Alaska District (COE), and the U.S. Coast Guard (USCG).

Additional information on the specific cleanup sites can be found on the *Annette Island Cooperative Cleanup Web Page*, <http://www.alaska.faa.gov/annette> and in the Administrative Record in the Metlakatla Library.

Contact the following agency representatives with specific questions concerning past or ongoing cleanup activities:

- **MIC** **Jeff Benson** (907) 886-4200 micenvir@eagle.ptialaska.net
- **BIA** **Ed Gunyah** (907) 886-3791 biamet@metlakatla.net
- **FAA** **Garth Beyette** (907) 271-3355 garth.beyette@faa.gov
- **COE** **Robert Johnston** (907) 753-5664 robert.johnston@poa02.usace.army.mil
(acting for Andrea Elconin)
- **USCG** **Bob Deering** (907) 463-2440 rdeering@cgalsaka.uscg.mil



This 1965 photo of the Annette Island Airport in operation shows the hangar at the south end of Runway A. This area is subject to investigations and fuel storage tank removals.

MEMORANDUM OF UNDERSTANDING

To address the impacts of past government activities on Metlakatla Peninsula, the US Army Corps of Engineers (COE), the Bureau of Indian Affairs (BIA), the US Coast Guard (USCG), and the Federal Aviation Administration (FAA) conducted an environmental review of the former government facilities in August 1997. After completing the environmental review, the COE, BIA, and FAA signed a memorandum of understanding (MOU) with the MIC to cooperatively address environmental issues associated with past government activity on Annette Island. The project manager with the Coast Guard is working with the other agency managers as an informal member of what is now called the MOU Work Group.

Since 1997, the MOU Work Group has held meetings in Metlakatla or via teleconference on a regular and frequent basis. The group discusses issues associated with accomplishing the cleanup work, including MIC priorities, technical approaches, regulatory requirements, sharing of data, coordinated scheduling of work activities, and community outreach.

C3 PLAN

The Coordinated Comprehensive Cleanup (C3) Plan was developed by the MOU Work Group and the USCG to outline the remediation work needed at these former government sites. The C3 plan is a tool used to help the MIC, the BIA, the FAA, the COE, and the USCG work effectively while maximizing the efficiency of government cleanup efforts on the Metlakatla Peninsula. Specifically, the intent of the plan is to:

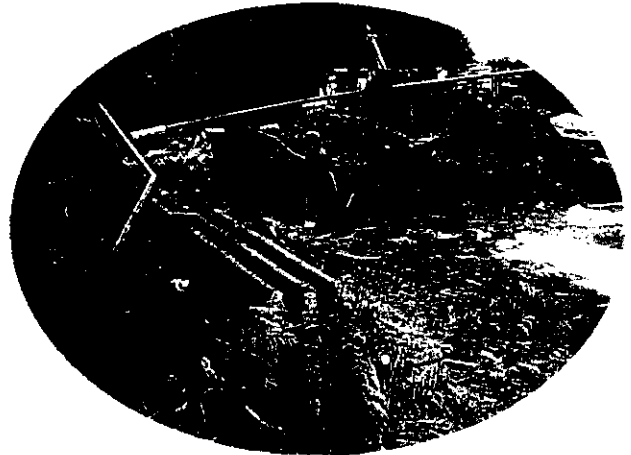
- Identify all sites with potential COE, BIA, FAA, MIC, and USCG liabilities;
- Identify the needed cleanup work at each site and associated costs; and
- Identify a time schedule to cost-effectively coordinate cleanup work.

Lead Agency: To streamline the cleanup process, the MOU work group and USCG have identified a lead agency for each site. The lead agency acts as a point of coordination for the cleanup. The agency selected as the lead agency is usually the one most familiar with the site and site operations, but does not necessarily assume any financial or legal responsibility for contamination at the site.

WORK ACCOMPLISHED IN 2000

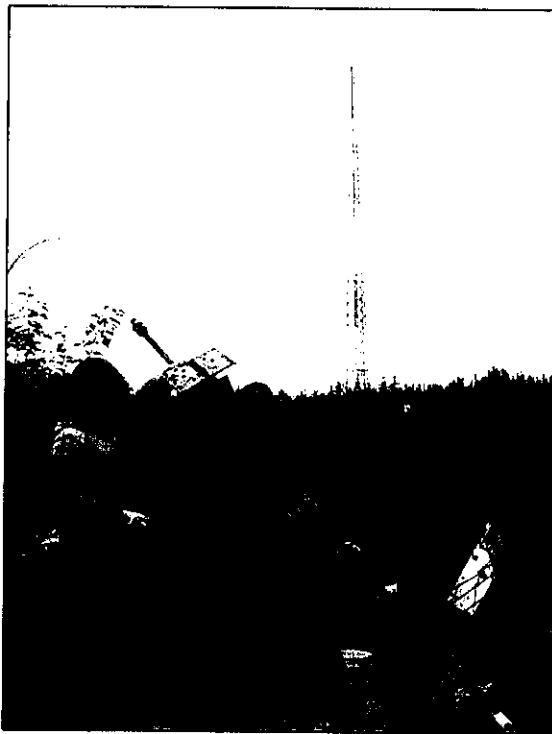
COE

- **Fuel Pipeline Cleaning and Abandonment:** Approximately 10,000 feet of former fuel line was drained and cleaned to prevent any potential leaks or spills to the environment. Approximately 7,000 gallons of fuel/water mixture was removed. All wastes were disposed off-island.
- **Contaminated Soil Removal:** The Corps returned to the old WWII water treatment plant at Yellow Hill Lake and removed additional mercury-impacted soil around the debris from this plant.



Pipeline decommissioning was conducted in 2000 as part of USCG project responsibilities. Here workers prepared a section of the line for removal near the main dock.

- **Sampling At Former Drum Locations:** Started in 1999, additional sampling was continued to define any additional cleanup required. Soil and water samples were collected at two former drum dumps.



Metlakatla residents (left to right) Rob Scott, Benny Eaton, and Tim Williams worked on the FAA tower demolition project in the summer of 2000.

- **Background Investigation:** A variety of environmental samples were collected as part of a study to define the levels of naturally-occurring metals and chemicals in the soils and surface waters on the Metlakatla Peninsula. Samples were collected from 13 locations.
- **Historical Documentation:** Almost 200 WWII buildings and installations on the peninsula were investigated and documented by archaeologists and historical architects to record the historical significance of past activities on Annette Island.
- **Sampling at the former Hospital Area:** As follow up to last year's investigation, additional soil and water samples were collected at the former hospital area.
- **Site Research and Summaries:** Draft data sheets were prepared to provide an executive summary for each FUDS site. Information about each of the sites was pulled together from many different documents to provide a quick look at the site history and possible environmental issues.

WORK ACCOMPLISHED IN 2000

(continued)

- **Culvert Design:** A culvert installation was designed for Colby Creek at the former hospital area off Tamgas Harbor Road. Incorporated MIC and BIA requirements for the design.
- **Community Outreach:** Two community outreach activities were conducted. A booth was set up at the Health Fair and at the Founders' Day celebration to answer questions and hand out fact sheets about the federal agency cleanup activities.

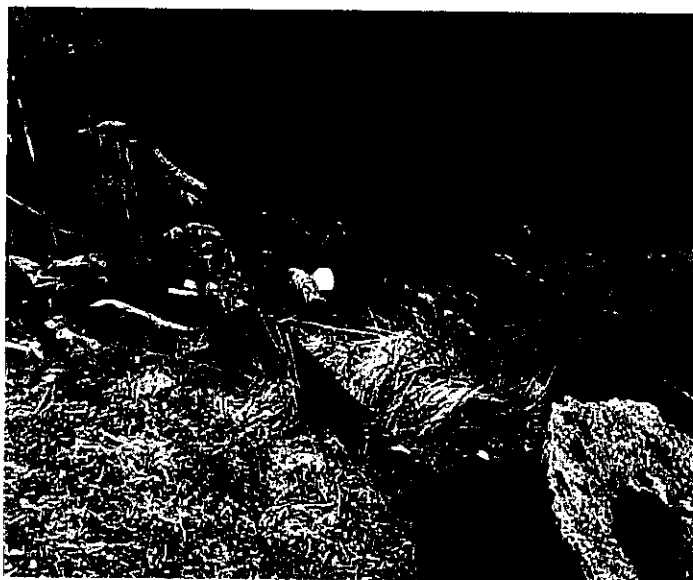
FAA

October 1999 through October 2000 Field Accomplishments:

- **Site Preparation:** To prepare for the release investigation, brush clearing and grubbing was done in 1999. In Spring of 2000, debris associated with drums, scrap metal, abandoned vehicles, and collapsed buildings and structures were removed from 30 sites. All work was conducted through a contract between FAA and MIC.
- **Site Investigation:** Approximately 53 sites were investigated to determine the extent of contaminants possibly released into the environment. Sampling locations include the former asphalt plant area, tank farm at the old dock, former gas station, base camp area, former FAA Housing, former public school, former airfield power plant, and numerous areas at the hangar. Initial sampling results indicate heavier concentrations of contaminants at the old Power House, the old Gas Station, the Hangar area, and the Main Dock Tank Farm.
- **Tower Removal Project:** A total of 45 abandoned towers with lead-based paint were demolished and recycled, including the approach lighting system and several other abandoned towers around the peninsula.
- **Drum Removal:** A total of 800 abandoned drums were removed from the air field revetments and recycled off the island.
- **Fuel Storage Tank Removal:** A total of 14 underground fuel storage tanks and one aboveground fuel storage tank was decommissioned and disposed of off the island.
- **Scrap Metal Removal:** The FAA took the lead in removing the large scrap metal pile from the quarry. In addition to the towers, this pile consisted of metal from the COE drum removal project and BIA drums removed from the Roads Shop last year. This removal also included a considerable amount of MIC white goods and metal that had been staged in the quarry throughout the past year. FAA shipped a total of approximately 700 tons of metal from Annette Island.
- **Historical Documentation:** Almost 400 sites and features were investigated by archaeologists and historical architects to record the significance of the FAA presence on Annette Island.
- **Treatability Study:** A study of potential remediation methods for fuel-contaminated soil began in September 2000. Working together with the COE, the FAA built three soil cells in a space provided by the BIA at the Roads Shop. The study will provide realistic information on how well the soil can be cleaned up using landfarming and composting techniques with locally-obtained fish and wood waste materials. The study is still ongoing, with locally-hired workers collecting samples and mixing the soil piles on a weekly basis.

WORK ACCOMPLISHED IN 2000

(continued)

USCG

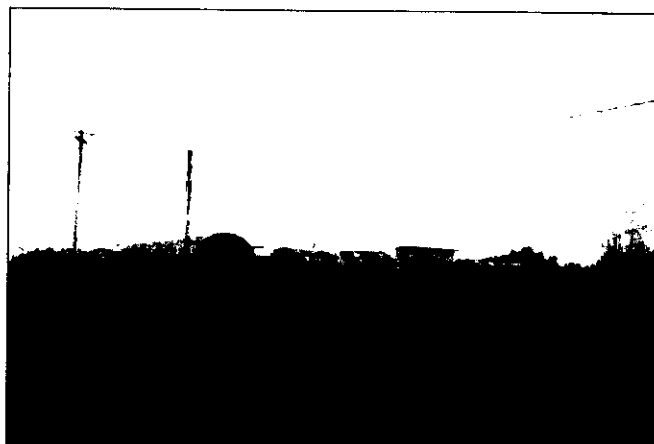
The USCG pipeline removal included sections once submerged in Tamgas Harbor. The potential for fuel release into the harbor and beach was eliminated.

- **Environmental Assessment:** The review of the results for the "preliminary assessments" of 13 environmental sites was completed and a report was prepared.
- **Aboveground Storage Tank Removals:** The process for the removal of three tanks located close to the hangar area was begun. The process includes preparing cost estimates, requesting funding, and obtaining SHPO clearance.
- **USCG Housing Area:** Investigation of the painting methods used for the Housing Area confirmed that there were no lead-based paint concerns. MIC Environmental concurred.

BIA

- **Roads Shop Building Demolition:** Using an initial environmental assessment and the C-3 Plan, a Report of Survey was completed and funding was obtained for demolition of buildings at the Roads Shop. Eight buildings and pads identified as contaminated were dismantled and disposed of, including the metal debris.

As part of the cooperative effort, all the metal debris was placed on the scrap metal pile in the quarry and removed from the island by the FAA. It is no longer a safety or health hazard.



The BIA Roads Shop cleanup included demolition of eight buildings and removal of debris. This photo showed the buildings before demolition.

LOCAL HIRE OF TRIBAL MEMBERS**COE**

The COE encourages hiring tribal members in Metlakatla whenever qualified personnel are available. Contractors are directed to comply with the TERO requirements to advertise locally for workers for activities performed at Annette Island.

Approximately one half of the field workforce has been hired locally.

Metlakatla	1999	2000
Total field workforce	13	14
Local field workforce	5	7
Percent Local Hire	46%	50%

FAA

FAA contracting specifically encourages hiring workers locally whenever possible. At Annette Island, local people and resources have been used to assist in the cleanup efforts.

In 1999 and 2000, the FAA accomplished two projects through Government-to-Government contracts with the MIC. The first project was clearing and grubbing at approximately 30 sites. The second project was the removal of buildings, debris and vehicles from about 30 sites. This work was conducted in preparation for the investigation work that was performed at these sites during the 2000 field season.

The FAA has hired over a dozen tribal members within the last year to work on brush clearing, tank and debris removal, site investigations, tower and steel removal and soil treatability studies.

BIA

Twenty-one jobs were generated by BIA's support on behalf of tribal members.

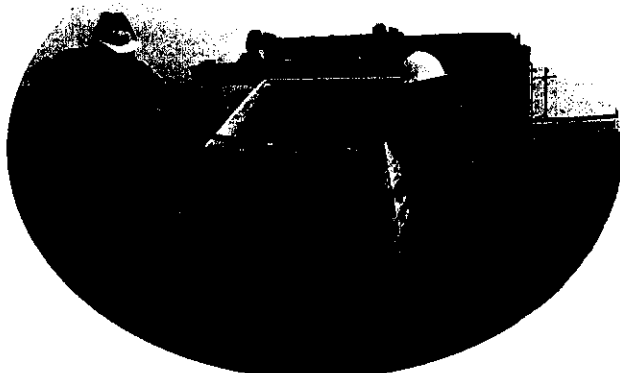
For the environmental cleanup efforts, three tribal members were hired to perform repair work to the BIA Road Shop facilities. Four tribal members were hired to dismantle eight road-shop buildings and move contaminated material into the quarry for disposal.

THE FUTURE



WORK PLANNED FOR 2001

COE



The contaminated soil treatability study incorporated fish waste and wood chips obtained on Annette Island to test the effectiveness of the composting strategy.

- **Culvert Installation:** Installation of a new culvert across Colby Creek at the former Hospital area. This installation will provide fish-friendly and safe access to the site for cleanup crews.
- **Contaminated Soil Removal:** Fuel-impacted soil will be removed from the former hospital area and Canoe Cove Garrison. Also, depending upon the results of the year 2000 sampling, other contaminated soil may be excavated from sites that have already been sampled.
- **Release Investigations at Six Sites:** Soil and water samples will be collected and

several shallow wells will be installed at six sites listed in the C-3 Plan to determine if a release of any contaminants (primarily fuel) has occurred.

FAA

Funding has been requested to:

- Perform feasibility studies to determine the best cleanup methods for the following sites:
 - 11 underground and aboveground storage tank sites
 - 15 sites (sand shed, gas station, fire truck hut, former FAA navigational aid locations).
 - Navigational facilities (VORTAC/Non Directional Beacon) Lead Issues
- Conduct site investigations to determine the potential for contaminants to leach from inactive power cables.
- Sample 100 monitoring wells and probes installed in 2000.

THE FUTURE



WORK PLANNED FOR 2001

(continued)

- Prepare and implement a work plan for an expanded site investigation (fill in data gaps at 10 sites). Field work is tentatively scheduled for late Fall 2001 or early 2002.
- Continue site preparation: removal of towers, buildings, and drums.
- Continue working on data management and development of a Geographical Information System (GIS) database.
- Continue the on-going soil treatability study.

USCG

Funding has been requested for the following work:

- **Aboveground Storage Tank Demolition:** Completely remove all visual traces of three aboveground storage tanks (ASTs) near the hanger. This includes one 4,000-gallon and two 10,000-gallon ASTs, associated above and below-ground piping, all concrete support structures, and pads. All tank contents and debris will be removed off-island.
- **Additional Investigations:** Return to the following sites to collect additional data to determine the extent of contamination:
 - Former Coast Guard storage areas along Runway B
 - Revetment used for fuel storage at Crab Point
 - Hangar at south end of Runway A

BIA

- **Roads Shop Environmental Assessment:** Continue to make progress toward the goal of cleaning up the Roads Shop as described in the C-3 Plan.
 - Locate buried material on the 2 1/2 acres of property. Flag and survey each area.
 - Conduct random sampling over the whole area to determine the type and extent of any contamination.
 - Collect soil samples at the Shop facility.

The results of the testing will drive funding requests for cleanup work next year.

EDUCATION INFORMATION ACCESS



COMMUNITY OUTREACH

The federal agency outreach in Metlakatla incorporates participation in community events and providing information on many different levels. This included display booths and information handouts, at both the Health Fair and Founders' Day in 1999 and 2000, which explained cleanup efforts. These events were advertised with flyers and spots on MIC TV and were well attended by students and adults. Quarterly newsletters with up-to-date information on cleanup activities are planned. An Administrative Record (a compilation of key documents such as letters, plans and reports) is another way in which information about the cleanup is made available to the community. This Administrative Record is located at the Metlakatla Public Library.

The FAA has created a web site devoted specifically to the Annette Island Cleanup. Any community member with internet access can find information on agencies, projects, and schedules.

The web site address is <http://www.alaska.faa.gov/annette>. It includes detailed information on:

- Memorandum of Understanding (MOU) Work Group
- Coordinated, Comprehensive Cleanup (C3) Plan
- Cleanup Timeline
- Current Events
- Website Links
- Administrative Records
- References
- Drawings
- Specific Projects
- Contact Information



As part of the federal agency community outreach, the FAA and COE presented display boards and explained to Metlakatla residents project activity at both the Health Fair and Founder's Day in 1999 and 2000.

Because of the extensive scope of the Annette Island Project, the number of agencies involved, and the timeline of the project, a Geographical Information System (GIS) is being developed by the MOU. The GIS will enable efficient management of the vast amounts of environmental data generated by each of the agencies during the project.

- Storing environmental data in a common, interactive file.
- Tracking important aspects and details of the investigation and cleanup processes at all the sites
- Providing a means for all parties to easily access, download, and illustrate the available data

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EDUCATION INFORMATION ACCESS



CULTURAL RESOURCES

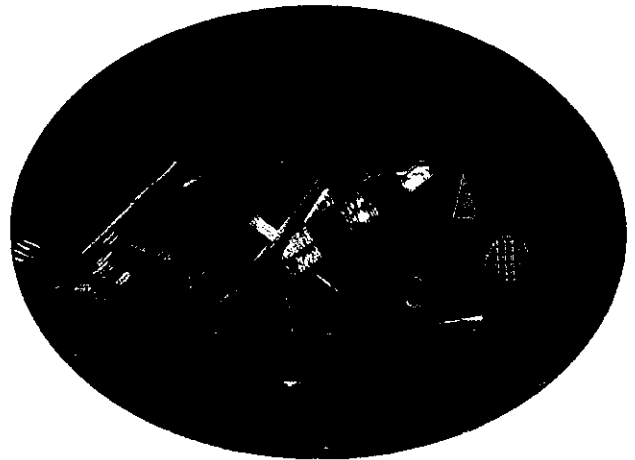
AGENCY COMPLIANCE WITH SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT (NHPA) OF 1966

Each agency involved in the Annette Island Cleanup must comply with the Section 106 mandate of the National Historic Preservation Act (NHPA) of 1966. This federal law applies to any construction or environmental cleanup project that is federally funded (either totally or partially). Whenever federal money is used for a project, the agency in charge must first determine:

- 1) if there are any cultural, archaeological, and/or historic sites at or near the project area, and
- 2) how these sites may be affected by proposed project activities.

The intent of the NHPA is to preserve the unique and diverse historic heritage of our nation. However, this does not mean that all structures with historic significance must be left standing. For example, many of the World War II buildings, structures, and objects on the Winnepeg and Tokio Garrisons, airport towers, and fuel storage tanks, contain hazardous materials or are structurally unsound. In cases like these, agency compliance with Section 106 does not prevent demolition of the property. Before removal, however, the SHPO may require documentation of the property in the form of architectural drawings and photographs.

Incorporating Section 106 compliance into the project may sometimes extend the schedule for planned activities. However, the end result will be successful environmental remediation and the preservation of Annette Island's cultural significance to the MIC and its importance to the nation during WWII.



In 2000, almost 2,000 sites and features on the Metlakatla Peninsula were documented by archaeologists to determine their World War II or post-WWII historical significance, such as the Localizer Building used by the FAA as an original aircraft navigational aid.

AGENCY CHALLENGES

The cooperative efforts of the MOU have been successful, and significant progress has been made in identifying possible contamination, removing drums and debris, and cleaning up many of the sites. While the work continues, the following issues need to be discussed and resolved in order to expedite the cleanup:

- **Jurisdiction** – Most agencies are only able to fund work on the sites for which they have jurisdiction. For example, the COE can only spend FUDS money on formerly used defense sites. If another agency or private company used these sites for “substantial beneficial use” after the military left, the sites may no longer be FUDS- eligible. Likewise, the USCG and the FAA have similar constraints. If other parties are potentially responsible for cleanup at a site, those parties will be asked to take part in the cleanup. This may cause work at that site to be scheduled after resolution of responsibility.
- **Closure Process:** The federal agencies would like a written process implemented to document when all of the required environmental clean up requirements at a particular site have been completed and accepted by the MIC. Completion of this process would close the site and release the agency from long- term liability. Site closure allows a shift in funding and effort to the other sites at Annette Island that need investigation or remediation.
- **Funding Availability:** Other projects managed by BIA, USCG, FAA and COE all compete with the Annette Island Cleanup project for funding. The level of accomplishment each year on Annette Island partly depends upon when and how much money has been allocated to this C-3 project. It also depends on the ability of each agency to obligate allocated funds to specific work before federal funding is withdrawn.
- **Capacity of MIC Environmental Office:** Significant demands are made upon the MIC Environmental office to handle a large volume of coordination requested from all of the agencies. This includes reviewing work plans, reports, and proposals; responding to written requests; providing direction to contractor personnel; serving as liaison between agency managers and the MIC Council and Mayor, as well as other MIC departments; and participating in meetings and resolving regulatory and technical issues. Additional local staffing and resources (technical and other) would be beneficial.

AGENCY GOALS AND FUNDING

Each agency mandate and funding constraints are unique. The following table summarizes these issues.

AGENCY GOALS AND FUNDING

Agency	Mandate/Mission	Funding Constraint	Relationship to Other MOU Agencies
BIA	<p>The BIA has trust responsibility on behalf of the Department of the Interior (DOI). The Environmental Policy signed by the Secretary of DOI states that the DOI will identify and remove any safety and health risks to the public. BIA may suggest and offer assistance to clean up sites pending MIC approval.</p>	<p>Funding comes from the Environmental Management Office. Each region receives a share of the funds. Funding requests for Annette Island are made to the regional office in Portland. There are 43 tribes within the Portland Region. The Annette Island Cleanup competes with the other tribes' projects for funding.</p> <p>Cleanup work to be contracted may be first offered to the MIC. If MIC declines, then the BIA may elect to perform the work themselves or contract it to others. If the work is contracted out, the contractor must follow federal procurement guidelines.</p>	<p>Other than the Annette Island MOU, there are no special agreements in place with the other federal agency members.</p>
FAA	<p>The mission of the FAA Environmental Cleanup Program is to effectively manage hazardous materials and ensure that all FAA facilities meet existing and future federal, state and local environmental regulations for cleanup of hazardous substances resulting from past FAA practices.</p> <p>Site restoration involves identifying, investigating, and cleaning up or controlling contamination from past hazardous waste disposal operations and hazardous material spills.</p>	<p>The FAA projects yearly budgets to Congress 3 years in advance. Each year, Congress funds the Department of Transportation, which in turn funds FAA (nationally) for 1 year. Each FAA region receives funding for the new fiscal year and the projects compete for their share. It is usually December by the time the funding for the fiscal year is allocated for Annette Island. This funding needs to be awarded or obligated usually by midsummer of each year or it may be diverted to other projects.</p>	<p>In addition to the Annette Island MOU, the FAA has a separate MOU for Annette Island with the USCG.</p> <p>The benefit of this USCG/FAA agreement is that it is easier for the two agencies to work together administratively, in contracting, and sharing information.</p> <p>The FAA and USCG have shared the services of contractors to perform work concurrently.</p>

AGENCY GOALS AND FUNDING (continued)

Agency	Mandate/Mission	Funding Constraint	Relationship to Other MOU Agencies
COE and the Formerly Used Defense Sites (FUDS) Program	Reduce the risk to human health, safety and the environment from contamination resulting from past Department of Defense (DoD) activities, and protect health and safety by removing unsafe structures and debris from past DoD operations. These goals are accomplished by conducting inventories, studies, design work and cleanup. FUDS program funding goes to sites with the greatest potential for human health hazards	A 3 to 5-year budget is provided to Congress. Funding for one year at a time is provided to the COE nationwide. This money is then divided between the districts. The higher priority sites (based upon potential hazard) receive more of the funding. The funding that is provided for a site must be used within that year or it will be diverted to other projects.	The COE works in cooperation with the other federal agencies and may carry out work for them as requested.
USCG	Reduce risk to human health and the environment and reduce the liability of the USCG.	<p>The USCG complies with numerous federal environmental acts. A single budget is allocated to the Civil Engineering Unit in Juneau for the state of Alaska. All the sites are prioritized based upon possible hazards, regulatory concerns, outside influences and operations needs. The available funding is applied in line with these priorities.</p> <p>The money can be used for clean up of Coast Guard-generated contamination, but excludes lead-based paint and asbestos abatement.</p>	<p>The USCG has a separate MOU for Annette Island with the FAA.</p> <p>The benefit of this USCG/FAA agreement is that it is easier for the two agencies to work together cooperatively in contracting and in sharing information.</p>

